

P.1
William K. Reilly
EPA Administrator
Washington, DC 20460

November 12, 1990

Dear Mr. Reilly,

I am a member of Environmental Defense Fund and I am writing over my concern about the use of MMT as a gasoline additive.

Please reject Ethyl's application to use MMT.

The health of the environment AND we, the people, is FRAGILE. We cannot tolerate any more potential threats to our health. There is too much unknown about the effect of manganese as it collects in dust + soil.

I believe we should be removing potential and KNOWN threats to health and environment and DEFINATELY not adding any POTENTIAL long term problems by using MMT.

Our emphasis should be on alternatives to gasoline - and development of public transportation without cars. Gas is NOT CHEAP any more... for all the years of "cheap" oil we must allocate the cost of the WAR in the MIDDLE EAST to the price of oil. OIL is expensive in DOLLARS and now, potentially hundreds of thousands of US men + women's lives.

Jamie Wilson
11405 W. Twin Lakes Road
Rathdrum, ID 83858-8704

RECEIVED
EPA
CORR. CONTROL
40533
90NOV 16 P 1:08

Elizabeth W. Russell
42 Howell St.
Canandaigua, NY 14424

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

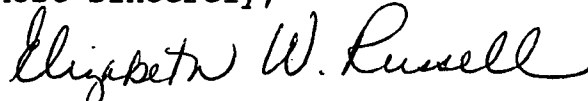
Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,



Elizabeth W. Russell

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40543

90NOV 16 P 1: 06

1851 Gilardy Drive
Concord, CA 94518
November 12, 1990

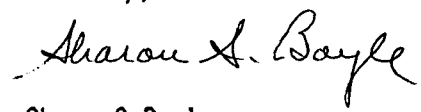
William K. Reilly
EPA Administrator
Washington, DC 20460

Dear Mr. Reilly:

I have read with much concern about Ethyl Corporation's application to use MMT. The jury is still out on the effect this might have on our environment. There is a strong possibility that it could cause as much damage as lead has.

I urge you to reject this application by Ethyl Corporation.

Sincerely,



Sharon S. Boyle

SSB:s

112 117 11

90NOV 16 P 1:07

6700 Belmont, No. 8
Houston, Texas 77005

November 5, 1990

William K. Reilly
Environmental Protection Agency
Washington, D.C. 20460

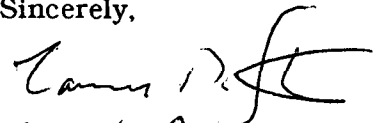

Dear Mr. Reilly,

We are writing concerning the application by the Ethyl Corporation for approval from your agency of a new gasoline additive called methycyclopentadienyl manganese tricarbonyl (MMT). The use of another heavy metal additive in gasoline, namely lead, has had many negative consequences, a number of them we are just beginning to control.

At high dose, manganese is a human neurotoxin. We feel very strongly that the health effects and potential toxicity of chronic, low-dose exposure to manganese should be thoroughly understood and carefully documented before the EPA acts on Ethyl's application.

We urge the Environmental Protection Agency to proceed cautiously in its review of MMT.

Sincerely,

Lawrence D. Stern
Renee Freedman Stern

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EPA

CORR. CONTROL

4047

90NOV 16 AM 11:23

Mr. Reilly,

As an EDF member I must urge you
to reject Ethyl's application to use
MNT.

Thank you,
James V. McLean

3565 FAWN COVE #3
PORTAGE, MI 49002

90NOV 16 11:20

40785
EPA
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EDF and Cancer Researchers Join to Save the Pacific Yew

Prominent cancer researchers and ten environmental groups joined EDF in petitioning Interior Secretary Manuel Lujan to list the Pacific yew (*Taxus brevifolia*) as a threatened species under the Endangered Species Act. Simultaneously, the American Cancer Society urged Lujan to "take any and all actions to protect the Pacific yew as a 'threatened species.'"

The bark of the tree, a slow-growing species found mainly in the ancient forests of the Pacific Northwest, is the only known source of taxol, one of the most promising new drugs for treating various cancers, including advanced ovarian cancer. A shortage of natural taxol is constraining medical research, and all attempts to synthesize the drug have failed.

"It is incredible that the Pacific yew receives virtually no protection on either private or public lands, in view of its rarity and importance to cancer research and treatment," said EDF attorney-scientist Bruce S. Manheim, who drafted the petition to Lujan.

The Pacific yew was once found widely in forests from Alaska to central California, but it has been seriously depleted by heavy logging. According to one estimate, only 5% of original Pacific yew habitat in ancient forests remains.

The thin bark of the yew makes it particularly vulnerable to clearcut logging and burning. Moreover, the yew does not grow fast enough to reestablish itself in tree plantations during the typical 50-to-80 year rotation.

Taxol's extraordinary effectiveness as an anti-cancer compound was shown in a recent trial in which it produced a positive response in 30% of ovarian cancer patients who had not responded to previous treatment. Preliminary results from other



T. Charles Erickson

Attorney-scientist Bruce S. Manheim has worked with 30 states to develop programs to protect endangered wild plant species.

studies suggest that taxol may also help in treating breast cancer, non-small cell lung cancer, head, neck, and stomach cancers, and malignant melanoma.

Listing the Pacific yew as a threatened species would authorize the Federal Government to protect the species from habitat destruction and commercial exploitation. It would permit a controlled sustainable harvest for medical research while prohibiting unauthorized collection of the tree for other purposes.

"The yew is a tangible example of the need to protect forests and the myriad living
Manheim
squand
produc
enormo

Task Force to Study Fast-Food Trash

Continued from page 1.

it has the clout and the ability to make this an important study by transforming the recommendations into an impressive set of actions. The joint study could have broad implications for all producers and users of plastic and paper packaging, in both food and non-food industries," Denison said.

Krupp emphasized the unique nature of the task force. "We hope this process will demonstrate how business and environmental groups with very different perspectives can nevertheless work together to improve the environment," he said. "At the same time, our agreement provides for each organization to preserve its independence and integrity." He emphasized that EDF will continue to pursue strong legislation and litigation on solid waste issues.

Press Reaction to Joint Announcement

"Big Mac Joins With Big Critic To Cut Trash"

—The Wall Street Journal

"...may break ground in the fight to protect the environment."

—The Boston Globe

"The concept of peaceful negotiation of differences may not find many takers in the Middle East. But it's gained new life here at home between a major environmental group that usually sues waste producers and one of its most likely targets, the giant McDonald's fast-food chain."

The Tribune, Oakland, California

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FORM 3547
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KALAMAZOO MI 49002-4781

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Watch for "EARTH TO KIDS:
A Guide to Products for a
Healthy Planet," this
December on HBO. Produced
by Consumer Reports Television
in association with EDF.

PEEL OFF FOR ORDER FORM INSIDE
05237004 AWL007
MR JAMES MAIRS
412 S 11TH ST
NILES MI 49120

PAID
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EDF Letter

A New Idea from the Folks Who Gave Us Leaded Gas

By EDF toxicologist Dr. Ellen K. Silbergeld, who was the only environmentalist to appear before the Environmental Protection Agency (EPA) to urge rejection of an application to use a manganese-based compound as a gasoline additive.

In 1925, the Ethyl Corporation introduced its new gasoline additive, tetraethyl lead, as "a gift of God." It took us over 50 years to realize how diabolical this "gift" proved to be. The hard-won



ELLEN K. SILBERGELD

removal of most lead from gasoline represents one of EPA's most significant public health achievements. I am proud to have participated with EDF in that victory.

Now, in 1990, Ethyl comes bearing yet another gift, methycyclopentadienyl manganese tricarbonyl (MMT), and asks EPA to approve it as an octane-enhancing gasoline additive. To this offering, EPA must just say "No."

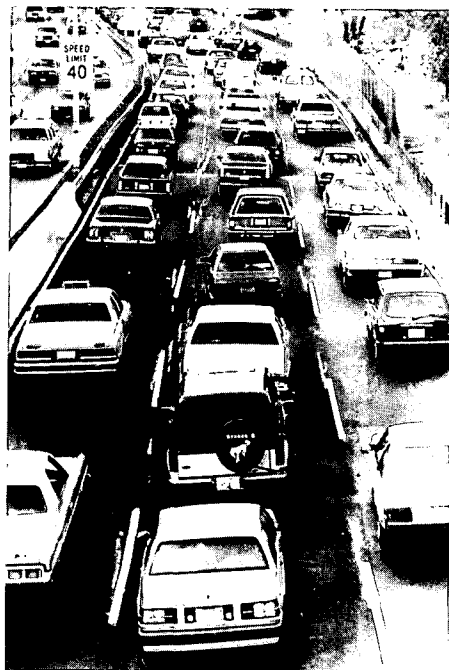
Lead poisoning is an epidemic in the U.S. Even after considerable reductions

Amazingly, in light of the history of leaded gasoline, Ethyl finds it unnecessary to do anything more in 1990 than it did in 1925.

have been imposed on the use of lead in gasoline—only after prolonged debate and litigation, it should be noted—we are just now confronting the extraordinarily difficult challenge of cleaning up the residues of lead fallout from playgrounds, roadsides, and backyards in America.

The parallels between Ethyl's 1990 proposal to use manganese and its 1925 lead proposal are chilling. The exclusive justification for each additive is its purported effect on emissions of hydrocarbons and nitrous oxides from cars. No data were or are given on the potential cumulative health effects of massive inputs of a toxic metal into the environment, its deposition on surface dusts and soils, or its long-term fate and pathways of exposure to humans.

In 1925, Ethyl argued that the amounts of lead to be added to gasoline were negligible and that lead was only toxic at the high doses encountered in certain industrial settings. In 1990, it argues that



Kirk Condyles/Impact Visuals

With ever-increasing numbers of cars on the road, manganese added to gasoline would—like lead—accumulate in the environment with potentially tragic results, particularly in urban areas.

the manganese releases to the environment will be insignificant and that manganese is only toxic at high doses in industrial settings.

In both cases, the critical national importance of accepting Ethyl's additive is argued. In a well-funded ad campaign claiming that MMT can reduce tailpipe emissions, Ethyl is seeking to exploit public concern over pollutants in global and local air. The purported reductions, if any, are very small and are overwhelmed by the health costs of exposure to manganese.

Amazingly, in light of the history of leaded gasoline, Ethyl finds it unnecessary to do anything more in 1990 than it did in 1925. Ignoring contrary evidence, it selectively cites bits of data to support its contention that the use of MMT will not increase airborne manganese concentrations over cities, and provides no data on the impacts of manganese additives on manganese levels in other parts of the environment. It presents no in-depth review of the health effects of manganese, nor—more important—any discussion of critical gaps in the data about manganese toxicity that must be filled before a decision that could release many thousands of tons of manganese to the environment can be approved.

The data on manganese are relatively sparse compared to lead—we have not yet conducted a massive human experi-

ment with manganese. But *both what we know and what we do not know* about the likely toxic effects of adding large amounts of manganese to the environment must persuade EPA to reject this application.

We know that manganese at high dose is a demonstrated human neurotoxin, with persistent and irreversible pathological effects on brain structure and resulting severe impairments in movement and mental state. We have indications that manganese may also selectively affect the fetus, the young, and the aged.

We do *not* know what the long-term chronic, low-dose effects of human exposure to manganese are. We do *not* know what a "safe" level of manganese exposure is, particularly for the young or the aged who may be at increased risk. We do *not* know if manganese is carcinogenic, although there is evidence that it can break DNA, which may indicate cancer-causing potential.

But from our tragic experience with lead, we know a great deal about the likely cumulative effects of such a use upon human exposure. We know that the gradual contamination of the environment by manganese will not be readily reversed. We know that manganese will

Society cannot afford to repeat the public health catastrophe associated with the use of lead in gasoline.

accumulate in many places—particularly in urban dusts and soils—that are subject to intensive human interaction and that will be sources of direct human exposure to manganese.

We rarely have an opportunity to apply the clear lessons of 50 years of very similar experience. To disregard these lessons by approving the widespread and inevitably dispersive use of manganese would be to invite repetition of the public health catastrophe associated with the use of lead as a gasoline additive since 1925. Society cannot afford such a repetition. EDF is urging EPA to reject this new application and immediately suspend all currently permitted use of manganese as a gasoline additive in the United States.

EDF MEMBER ACTION ALERT

Concerned members can help by writing to EPA Administrator William K. Reilly (Washington, DC 20460) urging him to reject Ethyl's application to use MMT.



addicts but to everyone, willing and unwilling, (And in the case of innocent Plants and Animals, Unknowing) Ethyl should have replaced Krupp in the operation of the Third Reich's gas chambers. Ethyl's illness-giving gain is not worth the risk to each and everyone of us. And I wouldn't think it would be to those who propose to faint the very breath of all Life, the air. But such a mad scheme is highly indicative that the schemers are themselves quite mad.

In a spiraling, suicidal descent history repeats itself, in ~~an~~ ever more deadly and destructive ways. The deepening and spreading undercurrent of madness, glimpsed in the passing current of events. Mustered gassing of troops becomes the nerve gassing of non-combatants. Humanity expands its petty crimes against ~~itself~~ into unrivaled genocidic crimes against the whole of Nature,

Dear Administrator Reily,

* I urge you to permanently and with all due haste reject

Ethyl's insensate application to use MMT.* Neither the

Nazis nor the legendary legions of perdition were lured by

lucres into imperiling themselves by expelling poisons into the

air they breathe. Even our cupidity-driven world places

certain restraints upon the "anything for a buck" predilection

of its more unstable and unscrupulous individuals. There are

stringently enforced prohibitions against the possession and

use of a range of drugs and the sale of alcohol and tobacco

to minors. Yet profit-pursuing Ethyl has the temerity to

introduce an unproven and lethal toxic metal into ^{the} ecosystem

and the human system. Worse than drug lords, ethyl attempts

to administer a body and brain abusing substance not do willing

the very Spirit of Life itself. And Ethyl goes from ~~inert~~
 leadening gas with lead in 1925 to advocating lacing the
 already overpolluted atmosphere of 1990 with methycyclo-
 pentadienyl manganese tricarbonyl. Of this horrendous
 misdeed, I shall never forgive. I will fight through
 the media to the halls of Congress against it. Drawing as many
 allies to my side as I can. Too much is at stake not to,

Yours Truly, And Forever, Opposed To Any And
 All Pollution,

J. C. Krieg
 J. C. Krieg

RECEIVED
EPA
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39662
90NOV 8 P1:15

Dear Mr. Kelly

I would like to recommend that you

deny Ethyl Corp. application for
"Hi Tec 5000" - a toxic manganese based
gasoline additive.

This action is a vital addition to the burgeoning movement to
restore the earth and its species whose existence humankind has so
shamelessly imperiled.

Thank you for your immediate attention to this matter.

Sincerely,

Gilene Wisniewski
3250 Garfield #102
MPLS, MN 55408

Cindy Steiner 5537 Nakomis Ave S MPLS MN 55417

Maryin Klein 5615 15th Ave S Mpls. Mn 55417

James DeBorch 5615 15th Ave S Mpls. Mn 55417

Bob Rose 2938 Ewing Ave S Mpls, 55416

Donna Rose " " " "
Susan Powell 6900 Sheridan Ave S Richfield, MN 55447

JAMES HUNTER " " " "

Sue Hamilton 2554 COMW AVE ST. PAUL 55108

Gynthia Dootley 2011 Third Ave S # 313 Mpls, MN 55404 (over)

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CORR. CONTROL
40381
90NOV 15 P 1:15

Wendy Newton 1914 Ave Tulcan Hts, MN 55113.
Pat Treelue 1338 Elm Mar Lane, Sagan, MN 55123

OTS

Dear Mr. Reilly
Enclosed You Will Find a letter That
was Brought To My Attention Last Week.
Though You are not an Elected official
You Have Been Put In office To protect
the Public and Public Interests.
Please Put a Stop To Big Business efforts
To Buy There Way Through Laws, Regulations
and Common Sense.
You Don't Have To Be a Scientist To Know
The effects of even small Amounts of
Heavy Metals ~~Induced~~ Absorbed By
Animals of any Species. These Harmful!!

Help Stop This Abuse
of our Environment

Thank you

Dave Dettman

10/19/80

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37343

900CT23 P3:39

Ethyl has until November 6th to convince EPA to approve HiTec 3000. And it has been running full page ads in major newspapers in a shameless effort to lure the public and the Administration into believing that its new additive is safe.

This is one of those rare chances we have to nip an environmental disaster in the bud. Here are the 3 steps I ask you to take immediately:

1. Add your name to our "Open Letter to the EPA" to appear in a major newspaper advertisement from EDF (see the enclosed draft) to help us tell the real story on Ethyl Corporation to newspaper readers.
2. Double the power of your protest by writing a short personal note to Administrator William K. Reilly, Environmental Protection Agency (401 M Street, SW, Washington, DC 20460).
3. Send your generous gift to support the newspaper ad and to help EDF continue this critical campaign.

You know that EDF can get results. Our persistent campaign against leaded gasoline helped win its large scale phasedown during the 1970's. But this was a battle we might never have had to fight, had Ethyl Corporation acted responsibly from the start.

You see, the hazardous potential of the original lead gasoline additive was never a secret to Ethyl. Back in 1925, 40 workers at Ethyl's first plant were stricken with lead poisoning and five of them died from it. But Ethyl Corp. ignored the obvious warning sign -- that these cases of acute poisoning foreshadowed a possibly tremendous chronic problem . . . once millions of tons of lead-laden car exhaust were pumped into the environment.

We simply can't let Ethyl Corp. put another toxic heavy metal additive in gasoline! There's no reason to open our environment to a new health hazard. We can't tolerate future unknown clean-up costs when this problem is altogether preventable today. And with your help, and the 3-step plan I've sketched above, we won't have to!

Ethyl Corporation managed to fool the public once . . . and the resulting damage to the environment and public health, much of it irreparable, is done. All we can say now is "Shame on them."

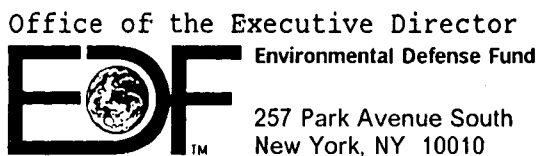
But if we let them do it again, shame on us!

Yours truly,



Fred Krupp
Executive Director

P.S. Please sign and return immediately the Authorization to add your name to our Open Letter. I must receive it no later than October 29th to meet our newspaper deadline. And thanks in advance for your help!



*** 1048 00002 1 ZP 0.205 BFED285A ***

Mr. David D. Dettman
308 S Main
PERRYTON TX 79070-3148

October 16, 1990

Dear Mr. Dettman:

I've had just about enough of the Ethyl Corporation. And once I tell you about the scheme that they're trying to put over on the U.S. population, I think you'll agree.

- The Ethyl Corporation of America is asking the EPA to approve a gasoline additive it calls "HiTec 3000."
- Ethyl Corp. has launched a full-blown ad campaign that misrepresents this new additive as both safe and environmentally beneficial.
- In reality, "HiTec 3000" contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses.
- Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

In other words, the Ethyl Corporation wants permission to use the entire U.S. population as test subjects in a very profitable experiment on chronic exposure to a toxic heavy metal.

And it won't be the first time!

Since 1925, Ethyl Corporation has championed the use of leaded gas, and has been the chief supplier of lead gasoline additives now known to have been a major contributing cause of chronic lead poisoning affecting millions of children around the world.

New research reveals a virtual lead poisoning epidemic among our nation's children, both urban and rural, rich and poor. Much of that lead -- ingested from dust and dirt in yards and playgrounds -- came out of the tailpipes of cars that burned leaded gas over the past 65 years. Cleaning up this contamination will be both slow and expensive.

Now, for the sake of its own profit, Ethyl Corporation is again ready to put our environment and public health at serious risk.

Luckily, you and I have until November 6th to stop them.

(over, please)

RAMADA INN

William K. Reilly, ADM.
EPA

401 M STREET, SW

Washington, D.C.
20460

THOMAS S. MOSES
78 CHASE RD.
NO. DARTMOUTH
MASS. 02747

1 Nov 90

Dear sir.

Haven't we learned yet!?

Obviously this is yet another ^{unconscionable} short cut taken by a company to achieve short term goals at the expense of long term effects.

We have a finite amount of resources (air, water etc.) that will keep us all alive.

Why jeopardize them?

We have only 1 planet. We can't pick up & move!

Please, Please reject this ~~may~~ proposal by Ethyl Corporation utilizing MANGANESE-based gasoline. A concerned engineer and earthling (who wants to stay that way)

RECEIVED

EPA

CORR. CONTROL

39907

90NOV 9 P 3:06

39907

Joseph B. Kruskal
42 Oakland Road
Maplewood, New Jersey 07040

19 Oct 1990

Mr. William K. Reilly
Environmental Protection Agency
401 M Street, SW
Wash, DC 20460

Dear Mr. Reilly -

Please do NOT approve
The application by Ethyl Corporation to
use "HiTec 3000", a manganese
containing additive for gasoline.

Sincerely,

Joseph B. Kruskal

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37339
900CT23 P3:40

Environmental Protection Agency
Administrator William K. Reilly
Washington, DC 20460

November 24th, 1990

Dear Mr. Reilly,

I am writing to you to urge you to reject Ethyl Corporations application to use MMT as a new additive to gas.

I am a mother of an infant boy and I am terrified to think of what kind of environment he has to survive in through his first years. Isn't it enough that he already has to be concerned ^{with} breathing in exhaust fumes and eating snow (kids really want to eat snow - they all **have** to breathe !) close to high-traffic areas ? Please let me not have to worry about him getting a totally new and perhaps unrecognizable poisoning after being exposed to high levels of manganese tricarbonyl. I know it took decades for the legislators to ban lead in gasoline and house paint and our children are still paying for it.

I have heard that Ethyl has presented some questionable and incomplete data to get their application accepted. Your organisation exists to protect the environment for all of us and environmental protection is finally politically savvy thing to support. I encourage you to be as rigorous and cautious when examining this proposal as the FDA was ^{when} they banned the infamous Thalidomide in U.S.A. All the mothers of the nation will eventually thank you for it.

Thank you for your attention.

Yours Sincerely,



Suvi Borodin
32 West Allens Lane
Philadelphia, PA 19119

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EPA
CORR. CONTROL
41582
90NOV 29 All: 29

Guru Shabad Singh Khalsa
12021 Wilshire Bl. #7041
Los Angeles, CA 90025

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,

Guru Shabad Singh Khalsa

Guru Shabad Singh Khalsa

RECEIVED
EPA
CORR. CONTROL
41605
90 NOV 29 AM 11:09

November 26, 1990

Mr. William K. Reilly
EPA Administrator
Washington, D.C. 20460

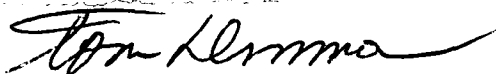
Dear Mr. Reilly,

I am writing to ask you to reject Ethyl Corporation's application to use a manganese based compound as a gasoline additive.

Society cannot afford to risk a repeat of the public health catastrophe that has occurred with the use of lead in gasoline. We do know that manganese in high doses is a human toxin.

Please do all you can to respond with a strong negative to this application. Thank you for your efforts.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Tom Demmon".

Thomas R. Demmon, P.E.
3092 Brockwood N.E.
Grand Rapids, MI 49505

RECEIVED
EPA
CORR. CONTROL
41566
90NOV 29 11:20

NOVEMBER 25, 1990

MR. WILLIAM K. REILLY:

I AM TAKING TIME THIS THANKSGIVING WEEKEND TO EXPRESS MY OUTRAGE OVER POSSIBLE FAILURES OF THE U.S. GOVERNMENT TO PROTECT ITS CITIZENS, WILDLIFE, AND BIOSYSTEMS. I REFER SPECIFICALLY: ① TO THE POSSIBLE USE OF MANGANESE-BASED COMPOUNDS AS GASOLINE ADDITIVES (MMT); ② TO THE POSSIBLE RELAXATION OF EXPOSURE STANDARDS OF THE TOXIC SYNTHETIC CHEMICAL DIOXIN; ③ TO THE POSSIBLE UNCONSCIONABLE DESPOIL-ATION OF THE ARCTIC NATIONAL WILDLIFE REFUGE BY OIL INDUSTRIALISTS. A TRUE WORLD LEADER, AS THE U.S. PROPORTS ITSELF TO BE, WOULD ^{FIND} THESE PROPOSITIONS UNIMAGINABLE.

AS A LIVING SUBJECT OF THE PRESENT MAD EXPERIMENT OF HUMAN EXPOSURE TO POISONS, AND A DEFENDER OF OUR INNOCENT NATURAL BIOSYSTEMS, I URGE YOU TO: ① REJECT ETHYL CORPORATION'S APPLICATION TO USE MMT AND HALT ALL PRESENT USE; ② REJECT MONSANTO AND BASF "STUDIES" AND RE-EXAMINE DIOXIN-RELATED REGULATIONS, POLICIES, AND DECISIONS WHILE ENFORCING PRESENT STANDARDS; ③ INSURE THAT EVERY MEMBER OF CONGRESS HAS BEEN NOTIFIED OF YOUR DOCUMENTATION OF EXISTING DAMAGE TO ALASKA'S NORTH SLOPE TUNDRA BY OIL COMPANIES: THEIR CHEMICAL SPILLS, OIL WASTES, LEAKING DRUMS, OVERFLOWING WASTE DISPOSAL PITS, TOXIC AIR POLLUTION, ROADS, AND VEHICULAR TIRE TRAILS.

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EPA
CORR. CONTROL
41582
90NOV 29 AM 11:30

I STRONGLY URGE YOU TO FULFILL THE
E.P.A.'S STATED MANDATE TO PREVENT
POLLUTION. A TOXIC CHEMICAL IS UNCOMPROMISING
IN ITS DESTRUCTION OF LIFE (LEAD, DDT, PRINCE
WILLIAM SOUND). YET ANY LAW, IN EFFECT OR
PENDING, REFERRING TO THESE INDUSTRIAL
POISONS, IS SUBJECTED TO "COMPROMISE"
BETWEEN THE MILITARY-INDUSTRIAL-FINANCIAL
COMPLEX AND "ENVIRONMENTALISTS". MAY
I POINT OUT THAT THE ENVIRONMENTS ARE
COMPROMISED, NOT ENVIRONMENTALISTS.

SINCERELY,

Allen E. Smolinski

ALWAN E. SMOLINSKI
1402 STATELINE RD.
CAKUMET CITY, IL,
60409

P.S.

MAY I OFFER MY CONGRATULATIONS UPON
YOUR FAR-SIGHTED VETO OF THE CONSTRUCTION
OF THE TWO FORKS DAM IN COLORADO!

Judy Bernal
626 Glen Holly Dr.
Pasadena, CA 91105

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460


Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,


Judy Bernal

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EPA
CORR. CONTROL

4/1/50
90NOV 26 P 4: 07

11/17/90

EPA Administrator
W K Reilly
EPA
401 M. Street SW
Washington DC 20460

Dear Mr. Reilly -

After researching background & test information
on Ethyl Corp HITEC 3000, I support
its approval for use. Reduction of emissions and
potential fuel savings are some of the compelling
reasons.

Very truly yours

F. A. Achey

Fred A. Achey
3345 Nazareth Pike
Bethlehem Pa. 18017

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EPA
CORR. CONTROL
2/1/93
90NOV 23 P 1:41

Amy Phillips
23 Henley Rd
Overbrook Hills, Pa 19151

Nov. 19, 1990

William K. Reilly, EPA Administrator
EPA
Washington, DC 20460

Dear Mr Reilly,

We urge you to reject Ethyl's application
to use MMT as a gasoline additive in the U.S.

This substance is dangerous & may pose a greater
threat to the health of our children than even
lead. Please consider this matter with our
children in mind.

Sincerely,
Amy J. Phillips

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EPA

CORR. CONTROL

40950

90NOV 21 P 1:51

P. 42
Christine Moughan
P.O. Box 894
Boulder, CO 80306

W. Reilly, Administrator
EPA.

Boulder, 11/14/90

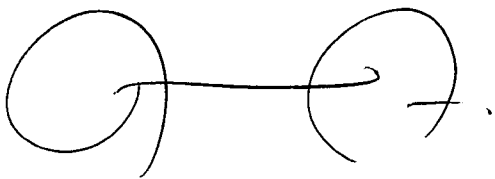
Dear Mr Reilly:

As a concerned and conscious consumer, I am writing
you to urge you to reject Ethyl's application to use MMT.

I want to live, to live in a world pollution-free, and
to teach my children the lessons harshly learned from 1925.

It is 1990, ending, and I urge you, Mr Reilly, for my
children, and yours, to ~~take~~ prompt and firm action
against MMT.

Sincerely,



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EPA

CORR. CONTROL

40949

90NOV 21 P 1:50

November 17, 1990

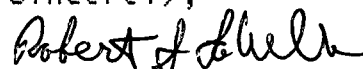
Mr. William K. Reilly
Environmental Protection Agency
Washington, D.C. 20460

Dear Mr. Reilly,

I am writing to express my concern over the Ethyl Corporation's proposed use of methycyclopentadienyl manganese tricarbonyl as a gasoline additive. The Ethyl Corporation introduced tetraethyl lead as a gasoline additive in 1925. The health impacts were never studied sufficiently. Lead poisoning is an epidemic in the U.S., partly as a result of this additive. We must not allow corporations such as Ethyl to profit from the introduction of toxic substances into our environment. Chemical companies have a tendency to focus on money and to neglect more important environmental considerations.

Please do not allow companies such as Ethyl, Dow, Grace and Dupont to introduce new chemicals without first proving that the new products are safe. Environmental damage should be repaired by the companies who create the damaging products.

Sincerely,



Robert S. LaVelle
1376 Carr Av.
Memphis, TN 38104

RECEIVED
EPA
CORR. CONTROL
4/29/79
NOV 21 4 9:23

November 19, 1990

William K. Reilly
EPA Administrator
Washington, DC 20460

My dear Mr. Reilly,

I am writing to urge you to REJECT the Ethyl Corporation's application to add methycyclopentadienyl manganese tricarbonyl (MMT) to gasoline.

Society cannot afford to repeat the public health catastrophe associated with the use of lead in gasoline! We have not yet conducted a massive human experiment with manganese, as we did with lead. But both what we know and what we do not know about the likely toxic effects of adding many thousands of tons of manganese to the environment MUST persuade EPA to REJECT Ethyl's application.

From our tragic experience with lead, we know a great deal about the probably cumulative effects of such a use of manganese upon human exposure. We know that the gradual contamination of the environment by manganese will not be readily reversed. We know that manganese will accumulate in many places--particularly in urban dusts and soils--that are subject to intensive human interaction and that will be sources of direct human exposure to manganese. We do not know what a "safe" level of manganese exposure is, particularly for children or the aged who may be at increased risk.

To disregard the clear lessons of 50 years by approving the widespread, and inevitably dispersive, use of manganese would be to invite repetition of the public health catastrophe associated with the use of lead as a gasoline additive since 1925. I must urge you to reject Ethyl's application and to immediately suspend all currently permitted use of manganese as a gasoline additive in the United States.

With good wishes and respect,

Lee F. Doyle

Ms. Lee F. Doyle
524 California Street
Newtonville, MA 02160

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EPA

CORR. CONTROL

40998

90NOV 23 P 1:44

20 Nov. 1990

William K. Reilly, Administrator
Environmental Protection Agency
Washington DC 20460

Dear Mr. Reilly,

I am writing to express my concern about the possible approval of methycyclopentadienyl manganese tricarbonyl (MMT) as a gasoline additive.

In the light of the disastrous results of leaded gasoline, which was considered to offer minimal impact to human and environmental health at its introduction, I find the thought of another such debacle absolutely chilling. One of the most basic gifts of human intelligence, one hopes, is that we learn from our past mistakes.

Please do not encourage Ethyl Corporation to pursue the introduction of MMT. Encourage them instead to pursue the development of alternatives to the use of petroleum fuels.

Thank you.

Sincerely,

Beth Weston

PO Box 152

Temple NH 03084

RECEIVED

EPA
CORR. CONTROL

41260

90NOV 27 P 3:41

2063 Geneva Ave. N.
Oakdale, MN 55128
November 5, 1990

Mr. William K. Reilly
EPA Administrator
Washington, DC 20460

Dear Mr. Reilly:

I am writing you to request that the EPA reject the Ethyl Corporation's application to add methycyclopentadienyl manganese tricarbonyl (MMT) to gasoline. Although Ethyl will claim that the acceptance of its application is of critical national importance due to MMT's ability to enhance octane and reduce tailpipe emissions, it is a very short-sighted solution (energy-wise) and merely trades one pollution for another. They also claim that the amount of MMT to be added is negligible and that MMT is poisonous only in high doses. However, Ethyl made the same claims about lead in 1925 so they have already thrown away their credibility. Although there have been no massive studies on the effects of manganese on humans and the environment, I ask that what we do know and do not know about the likely toxic effects of adding large amount of manganese to the environment will persuade you to reject Ethyl's application.

Sincerely,

Kathy Sedro

Kathy Sedro

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41267
90NOV 27 P 3: 44

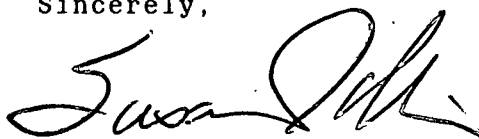
Nov. 9, 1990

William K. Reilly
Environmental Protection Agency
Washington, DC 20460

Dear Mr. Reilly,

I am strongly urging that the Environmental Protection Agency reject Ethyl Corporation's request for approval of methycyclopentadienyl manganese tricarbonyl (MMT). No data have been given indicating the potential cumulative health effects of massive inputs of this toxic metal into the environment. There is no in-depth review of the health effects of manganese on humans, and nor is there sufficient data regarding manganese toxicity. These gaps in data must be filled before making a decision that could release many thousands of tons of manganese into the environment.

Sincerely,



Susan Rollin
3208 Cahuenga Bl. W. #120
Los Angeles, CA 90068

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44569
90 NOV 27 13:44

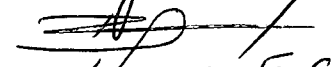


P.O. Box 421
Bolinas CA. 94924
November 18, 1990

Dear Mr. Reilly:

I urge you to reject Ethyl Corporation's application to use methycyclopentadienyl manganese tricarbonyl as a gasoline additive.

Do we need to repeat the problems we had with lead.

Respectfully

Thomas E. O'Connor

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EPA

CORP. CONTROL

41277

90NOV 27 P 3:46

Marybeth Cameron
348 N. Oakhurst Dr. #D
Beverly Hills, CA 90210

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

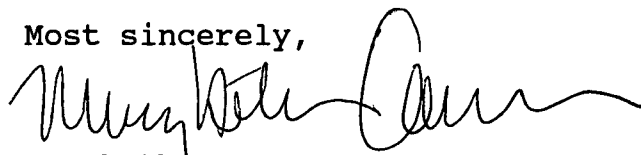
Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,

A handwritten signature in dark ink, appearing to read 'Marybeth Cameron', with a long, sweeping horizontal line extending to the right.

Marybeth Cameron

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EPA

CORR. CONTROL

41292

90NOV 27 P 3:48

Rebekah Davis
 Rt. 4 Box 1860
 Wimberley Tx 78676
~~Oct 29~~ / 1990
 Nov.

Mr. William Reilly
 EPA
 Washington DC 20460

Dear Mr. Reilly,

I must write to express my concern at the possibility of approving the use of manganese-based gasoline additives.

The poisoning of our land and of the American people by the use of leaded gas is one of the tragedies of the 20th century. It is a known fact that violent criminals in prisons have high lead levels in their blood.

Likewise do high school dropouts. Lead has caused irreversible damage to people and the environment. It is really frightening to see a repeat of this with the use of manganese. Heavy metals do not belong in our bodies. I hope you can protect us from this potential contaminant. Please do not decide to

allow this as we all watch on on
in horror! Let's learn from our past
mistakes, especially the ones that
have caused so much suffering.

Maybe you will even read this.

Sincerely
Rebekah Davis

Terence F. Gaffney Jr.
355 Riverside Drive
New York, N.Y. 10025

WILLIAM K. REILLY
ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

DECEMBER 1, 1990

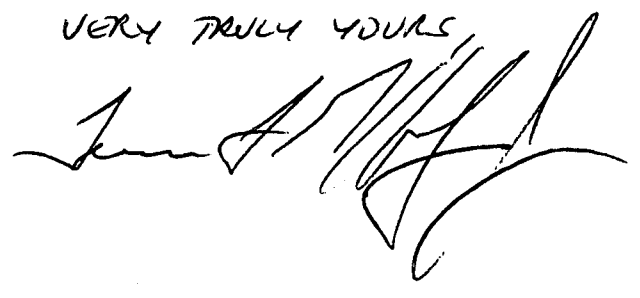
DEAR MR. REILLY:

I AM WRITING TO YOU TO EXPRESS MY HOPE THAT YOU WILL REJECT THE ETHYL CORPORATION'S APPLICATION TO USE METHYLCYCLOPENTADIENYL MANGANESE TRICARBONYL (MMT) AS A GASOLINE ADDITIVE.

THE POTENTIAL HARM THIS HEAVY METAL ADDITIVE SO FAR OUTWEIGHS THE POTENTIAL GAIN THAT TO EVEN CONSIDER ITS USE IS BOTH FOOLHARDY AND DANGEROUS.

I URGE YOU TO STAND FAST IN YOUR POSITION AGAINST THIS POTENTIAL THREAT AS YOU ARE THE BEST LINE OF DEFENSE WE HAVE.

VERY TRULY YOURS,



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42300
90DEC 10 PM 2: 44

Kimberly Hardy
226 Millpond Village
Hamden, CT 06514

11/30/90

EPA Administrator William K. Reilly
Washington, DC 20460

Dear Mr. Reilly:

Please reject Ethyl's application to use MMT. It is my understanding that manganese at high doses has proven to be a human neurotoxin. Although we may not thoroughly understand this chemical's advantages and/or disadvantages, we do know its manufacturer(s) for their blatant disregard for public and environmental health.

As protectors of the environment, I believe our focus should be on energy-efficiency and alternative energy sources to fuel, rather than the production of more chemicals to combat our already chemical-ridden planet.

Thank you,
Kimberly Hardy
Kimberly Hardy

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90DEC 5 P1:22

F050

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345 CALIFORNIA STREET, SUITE 1600
SAN FRANCISCO, CA 94104 • PHONE: (415) 296-0300

January 3, 1991

William K. Reilly
EPA Administrator
Washington, DC 20460

Dear Mr. Reilly:

I am anxiously looking forward to hearing you speak to the Commonwealth Club in San Francisco on January 9 to hear more about the EPA's direction for this decade.

Mr. Reilly, I am writing today to ask you to reject Ethyl Corporation's application to use MMT. The parallels between Ethyl's 1990 proposal to use manganese and its 1925 lead proposal are chilling. The purported reductions, if any, are very small and are overwhelmed by the health costs of exposure to manganese.

Please reject this new application and immediately suspend all currently permitted use of manganese as a gasoline additive in the United States.

Thank you for taking my opinion into considerations.

Susanne M. Karch
17 Bulkley Avenue
Sausalito, CA 94965

RECEIVED

EPA

CORR. CONTROL

341

91 JAN 8 P 2:12

5332 E. Michelle Drive
Scottsdale, AZ 85254
January 2, 1991

Mr. William K. Reilly
EPA Administrator
Washington, DC 20460

Dear Mr. Reilly:

Our Environmental Defense Fund Letter informs us that the Ethyl Corporation wants to introduce a new additive to our gasoline, methycyclopentadienyl manganese tricarbonyl (MMT) and is asking for EPA approval to do so.

We can only hope and pray that you and the other EPA officials will give them a resounding "NO"! We do not need the accumulation of any more additives chemicals, pesticides, etc. added to our soil and atmosphere. Will we never learn? We are having a hard enough time attempting to clean up what has already spoiled our earth.

We are enclosing the EDF article referred to in this letter, and we do hope the EPA will not let another "lead tragedy" become reality once again!

Thank you for your concern and attention to this most important matter.

Sincerely,

Judith N. Stepan

Judith N. Stepan

William E. Stepan

William E. Stepan

enc.

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EPA
CORR. CONTROL

364

91 JAN 8 P 2:42

A New Idea from the Folks Who Gave Us Leaded Gas

By EDF toxicologist Dr. Ellen K. Silbergeld, who was the only environmentalist to appear before the Environmental Protection Agency (EPA) to urge rejection of an application to use a manganese-based compound as a gasoline additive.

In 1925, the Ethyl Corporation introduced its new gasoline additive, tetraethyl lead, as "a gift of God." It took us over 50 years to realize how diabolical this "gift" proved to be. The hard-won

removal of most lead from gasoline represents one of EPA's most significant public health achievements. I am proud to have participated with EDF in that victory.



ELLEN K. SILBERGELD

Now, in 1990, Ethyl comes bearing yet another gift, methycyclopentadienyl manganese tricarbonyl (MMT), and asks EPA to approve it as an octane-enhancing gasoline additive. To this offering, EPA must just say "No."

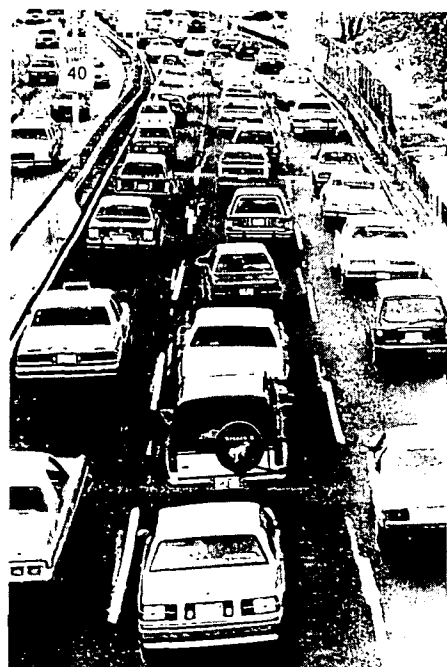
Lead poisoning is an epidemic in the U.S. Even after considerable reductions

Amazingly, in light of the history of leaded gasoline, Ethyl finds it unnecessary to do anything more in 1990 than it did in 1925.

have been imposed on the use of lead in gasoline—only after prolonged debate and litigation, it should be noted—we are just now confronting the extraordinarily difficult challenge of cleaning up the residues of lead fallout from playgrounds, roadsides, and backyards in America.

The parallels between Ethyl's 1990 proposal to use manganese and its 1925 lead proposal are chilling. The exclusive justification for each additive is its purported effect on emissions of hydrocarbons and nitrous oxides from cars. No data were or are given on the potential cumulative health effects of massive inputs of a toxic metal into the environment, its deposition on surface dusts and soils, or its long-term fate and pathways of exposure to humans.

In 1925, Ethyl argued that the amounts of lead to be added to gasoline were negligible and that lead was only toxic at the high doses encountered in certain industrial settings. In 1990, it argues that



Kirk Condyles/Impact Visuals

With ever-increasing numbers of cars on the road, manganese added to gasoline would—like lead—accumulate in the environment with potentially tragic results, particularly in urban areas.

the manganese releases to the environment will be insignificant and that manganese is only toxic at high doses in industrial settings.

In both cases, the critical national importance of accepting Ethyl's additive is argued. In a well-funded ad campaign claiming that MMT can reduce tailpipe emissions, Ethyl is seeking to exploit public concern over pollutants in global and local air. The purported reductions, if any, are very small and are overwhelmed by the health costs of exposure to manganese.

Amazingly, in light of the history of leaded gasoline, Ethyl finds it unnecessary to do anything more in 1990 than it did in 1925. Ignoring contrary evidence, it selectively cites bits of data to support its contention that the use of MMT will not increase airborne manganese concentrations over cities, and provides no data on the impacts of manganese additives on manganese levels in other parts of the environment. It presents no in-depth review of the health effects of manganese, nor—more important—any discussion of critical gaps in the data about manganese toxicity that must be filled before a decision that could release many thousands of tons of manganese to the environment can be approved.

The data on manganese are relatively sparse compared to lead—we have not yet conducted a massive human experi-

ment with manganese. But *both what we know and what we do not know* about the likely toxic effects of adding large amounts of manganese to the environment must persuade EPA to reject this application.

We know that manganese at high dose is a demonstrated human neurotoxin, with persistent and irreversible pathological effects on brain structure and resulting severe impairments in movement and mental state. We have indications that manganese may also selectively affect the fetus, the young, and the aged.

We do *not* know what the long-term chronic, low-dose effects of human exposure to manganese are. We do *not* know what a "safe" level of manganese exposure is, particularly for the young or the aged who may be at increased risk. We do *not* know if manganese is carcinogenic, although there is evidence that it can break DNA, which may indicate cancer-causing potential.

But from our tragic experience with lead, we know a great deal about the likely cumulative effects of such a use upon human exposure. We know that the gradual contamination of the environment by manganese will not be readily reversed. We know that manganese will

Society cannot afford to repeat the public health catastrophe associated with the use of lead in gasoline.

accumulate in many places—particularly in urban dusts and soils—that are subject to intensive human interaction and that will be sources of direct human exposure to manganese.

We rarely have an opportunity to apply the clear lessons of 50 years of very similar experience. To disregard these lessons by approving the widespread and inevitably dispersive use of manganese would be to invite repetition of the public health catastrophe associated with the use of lead as a gasoline additive since 1925. Society cannot afford such a repetition. EDF is urging EPA to reject this new application and immediately suspend all currently permitted use of manganese as a gasoline additive in the United States.

EDF MEMBER ACTION ALERT

Concerned members can help by writing to EPA Administrator William K. Reilly (Washington, DC 20460) urging him to reject Ethyl's application to use MMT.

4982 Sentinel Drive, Apt. 304
Bethesda, Maryland 20816
December 14, 1990

Mr. Fred Krupp, Executive Director
Environmental Defense Fund
257 Park Avenue South
New York City, New York 10010

Dear Mr. Krupp:

I have received the Environmental Defense Fund Letter of October 1990, Vol XXII, #4, which, on page 7, contains a diatribe by Ms. Silbergeld against the Ethyl Corporation and its advocacy of a manganese additive to increase the efficiency of gasoline motor fuel. No credible or even incredible scientific or statistical evidence was advanced -- the article as published is based on the fact that the Ethyl Corp. introduced lead as an additive to gasoline many years ago and that lead poisoned the atmosphere until its removal by EPA some years ago. Ergo - the manganese addition must be bad too!

At the time lead was added to gasoline, I was not (nor do I think many other persons were) aware of the dangers of atmospheric lead. Indeed, considering the low numbers of cars in those days, the danger probably was not great. Only the proliferation of people, cars, and urban crowding exacerbated the danger. Now we are removing old paint from buildings, old plumbing, old water fountains because we are aware of dangers, but I see no articles excoriating paint or plumbing companies.

Of course manganese in high concentrations is toxic. So are most other elements. So is salt. However, we know (if nutrition experts are to be trusted) that we need certain quantities of the so-called "toxic" elements to support our life systems, as do other animals and plants. That is why certain of these elements are routinely added to fertilizers.

In 35 years of close contact with manganese as a specialist on manganese for the U.S. Geological Survey, having visited hundreds of manganese deposits and mines extracting manganese minerals of widely varying composition on five continents, I have never encountered health problems attributed to manganese in workers in the industry. This does not mean that manganese in certain forms cannot be toxic; rather it means that allegations as to toxicity need to be backed up by carefully documented facts.

It is very important for environmental organizations to avoid ill-informed and exaggerated attacks on industries. Many industries are advancing the state of the science and art of avoiding damage to the environment. Some are not. Environmental organizations should encourage and assist those companies that are making honest effort and chastize those which are not. Many commodities needed by our complex civilization cannot be produced without some danger to the environment. Should we return to

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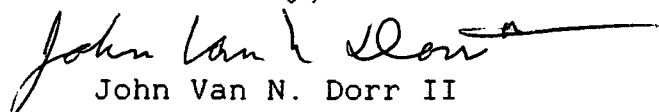
90DEC 20 AM: 10

caves? Could we?

Environmentalists characteristically underestimate the force of the mating instinct and the adaptability of animals to changing environments. Last August I had the pleasure of seeing hundreds of sea otters, seals, sea lions, eagles, various sea birds, on Prince William Sound. One would never learn of this recovery from the many environmental organizations to which I contribute. In the Prudhoe Bay oil fields I saw the complete compatibility of local wildlife and intelligent industrial development, but all I get from the environmental organizations to which I belong are outraged cries about possible development of ANWAR.

Environmental organizations should ask themselves whether the often shrill and misleading attacks on industries that are doing their best to provide needed commodities with minimal environmental cost are not responsible for our defeats last election day. The public is getting fed up and cynical, as well it might. Our past victories and the ones we still have to win, such as the elimination or at least strict control of clear-cutting, must be based on the education of the public in a responsible manner. The public is not stupid. We must supply objective, accurate information if we hope to receive continued support from the public.

Yours truly,


John Van N. Dorr II

CC: ✓ Mr. William Reilly, EPA Administrator ✓
Mr. Jay Hair, President, National Wildlife Federation
Ms. Sue Merrow, President, Sierra Club
Mr. John Sawhill, President, Nature Conservancy
Mr. Peter A. Berle, President, National Audubon Society
Mr. Robert Heist, President, Natural Resources Defense Council
Mr. George Frampton, President, Wilderness Society
Mr. Anthony White, President, Audubon Naturalist Society
Mr. Peter Bahouth, President, Greenpeace

MMT and its risks, I urge you
to reject the application.

Sincerely,

Katherine Côté
2B-15 Kulanihako Rd
Kihei, HI 96753

RECEIVED
EPA
CORR. CONTROL
4/8/75
90DEC14 P2:54



THE WESTIN BAYSHORE
Vancouver

Dec 9, 1990

Dear Mr. Reilly,

I hope my letter is not too late to dissuade you from accepting the Ethyl Corporation's application for a manganese gasoline additive. Since we know very little of the health risks involved, it would be foolish to approve MMT's use. Government agencies ought to encourage Americans to conserve and use less, rather than giving us another excuse to continue our wasteful habits. Please read the enclosed article, and think long and hard about

EDF and Cancer Researchers Join to Save the Pacific Yew

Prominent cancer researchers and ten environmental groups joined EDF in petitioning Interior Secretary Manuel Lujan to list the Pacific yew (*Taxus brevifolia*) as a threatened species under the Endangered Species Act. Simultaneously, the American Cancer Society urged Lujan to "take any and all actions to protect the Pacific yew as a 'threatened species.'"

The bark of the tree, a slow-growing species found mainly in the ancient forests of the Pacific Northwest, is the only known source of taxol, one of the most promising new drugs for treating various cancers, including advanced ovarian cancer. A shortage of natural taxol is constraining medical research, and all attempts to synthesize the drug have failed.

"It is incredible that the Pacific yew receives virtually no protection on either private or public lands, in view of its rarity and importance to cancer research and treatment," said EDF attorney-scientist Bruce S. Manheim, who drafted the petition to Lujan.

The Pacific yew was once found widely in forests from Alaska to central California, but it has been seriously depleted by heavy logging. According to one estimate, only 5% of original Pacific yew habitat in ancient forests remains.

The thin bark of the yew makes it particularly vulnerable to clearcut logging and burning. Moreover, the yew does not grow fast enough to reestablish itself in tree plantations during the typical 50-to-80 year rotation.

Taxol's extraordinary effectiveness as an anti-cancer compound was shown in a recent trial in which it produced a positive response in 30% of ovarian cancer patients who had not responded to previous treatment. Preliminary results from other



Attorney-scientist Bruce S. Manheim has worked with 30 states to develop programs to protect endangered wild plant species.

studies suggest that taxol may also help in treating breast cancer, non-small cell lung cancer, head, neck, and stomach cancers, and malignant melanoma.

Listing the Pacific yew as a threatened species would authorize the Federal Government to protect the species from habitat destruction and commercial exploitation. It would permit a controlled sustainable harvest for medical research while prohibiting unauthorized collection of the tree for other purposes.

"The yew is a tangible example of the need to protect forests and the myriad living resources within them," said Manheim. "If we do not, we will have squandered a rich storehouse of natural products that, like taxol, may have enormous medical value."

Task Force to Study Fast-Food Trash

Continued from page 1.

it has the clout and the ability to make this an important study by transforming the recommendations into an impressive set of actions. The joint study could have broad implications for all producers and users of plastic and paper packaging, in both food and non-food industries," Denison said.

Krupp emphasized the unique nature of the task force. "We hope this process will demonstrate how business and environmental groups with very different perspectives can nevertheless work together to improve the environment," he said. "At the same time, our agreement provides for each organization to preserve its independence and integrity." He emphasized that EDF will continue to pursue strong legislation and litigation on solid waste issues.

Press Reaction to Joint Announcement

"Big Mac Joins With Big Critic To Cut Trash"

—The Wall Street Journal

"...may break ground in the fight to protect the environment."

—The Boston Globe

"The concept of peaceful negotiation of differences may not find many takers in the Middle East. But it's gained new life here at home between a major environmental group that usually sues waste-producers and one of its most likely targets, the giant McDonald's fast-food chain."

The Tribune, Oakland, California

"One welcome side effect of the plan is McDonald's decision not to build incinerators at its restaurants to burn wastes."

—Star Tribune, Minneapolis-St. Paul

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Watch for "EARTH TO KIDS:
A Guide to Products for a
Healthy Planet," this
December on HBO. Produced
by Consumer Reports Television
in association with EDF.

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KIHEI HI 96753

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EDF Letter

A New Idea from the Folks Who Gave Us Leaded Gas

By EDF toxicologist Dr. Ellen K. Silbergeld, who was the only environmentalist to appear before the Environmental Protection Agency (EPA) to urge rejection of an application to use a manganese-based compound as a gasoline additive.

In 1925, the Ethyl Corporation introduced its new gasoline additive, tetraethyl lead, as "a gift of God." It took us over 50 years to realize how diabolical this "gift" proved to be. The hard-won



ELLEN K. SILBERGELD

removal of most lead from gasoline represents one of EPA's most significant public health achievements. I am proud to have participated with EDF in that victory.

Now, in 1990, Ethyl comes bearing yet another gift, methycyclopentadienyl manganese tricarbonyl (MMT), and asks EPA to approve it as an octane-enhancing gasoline additive. To this offering, EPA must just say "No."

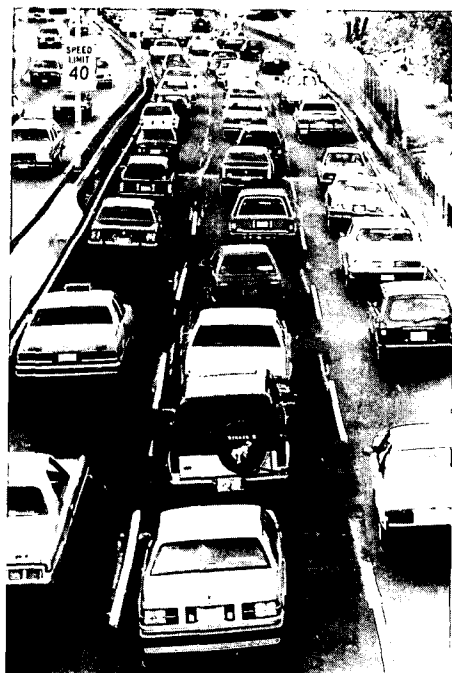
Lead poisoning is an epidemic in the U.S. Even after considerable reductions

Amazingly, in light of the history of leaded gasoline, Ethyl finds it unnecessary to do anything more in 1990 than it did in 1925.

have been imposed on the use of lead in gasoline—only after prolonged debate and litigation, it should be noted—we are just now confronting the extraordinarily difficult challenge of cleaning up the residues of lead fallout from playgrounds, roadsides, and backyards in America.

The parallels between Ethyl's 1990 proposal to use manganese and its 1925 lead proposal are chilling. The exclusive justification for each additive is its purported effect on emissions of hydrocarbons and nitrous oxides from cars. No data were or are given on the potential cumulative health effects of massive inputs of a toxic metal into the environment, its deposition on surface dusts and soils, or its long-term fate and pathways of exposure to humans.

In 1925, Ethyl argued that the amounts of lead to be added to gasoline were negligible and that lead was only toxic at the high doses encountered in certain industrial settings. In 1990, it argues that



Kirk Condyles/Impact Visuals

With ever-increasing numbers of cars on the road, manganese added to gasoline would—like lead—accumulate in the environment with potentially tragic results, particularly in urban areas.

the manganese releases to the environment will be insignificant and that manganese is only toxic at high doses in industrial settings.

In both cases, the critical national importance of accepting Ethyl's additive is argued. In a well-funded ad campaign claiming that MMT can reduce tailpipe emissions, Ethyl is seeking to exploit public concern over pollutants in global and local air. The purported reductions, if any, are very small and are overwhelmed by the health costs of exposure to manganese.

Amazingly, in light of the history of leaded gasoline, Ethyl finds it unnecessary to do anything more in 1990 than it did in 1925. Ignoring contrary evidence, it selectively cites bits of data to support its contention that the use of MMT will not increase airborne manganese concentrations over cities, and provides no data on the impacts of manganese additives on manganese levels in other parts of the environment. It presents no in-depth review of the health effects of manganese, nor—more important—any discussion of critical gaps in the data about manganese toxicity that must be filled before a decision that could release many thousands of tons of manganese to the environment can be approved.

The data on manganese are relatively sparse compared to lead—we have not yet conducted a massive human experi-

ment with manganese. But *both what we know and what we do not know* about the likely toxic effects of adding large amounts of manganese to the environment must persuade EPA to reject this application.

We know that manganese at high dose is a demonstrated human neurotoxin, with persistent and irreversible pathological effects on brain structure and resulting severe impairments in movement and mental state. We have indications that manganese may also selectively affect the fetus, the young, and the aged.

We do *not* know what the long-term chronic, low-dose effects of human exposure to manganese are. We do *not* know what a "safe" level of manganese exposure is, particularly for the young or the aged who may be at increased risk. We do *not* know if manganese is carcinogenic, although there is evidence that it can break DNA, which may indicate cancer-causing potential.

But from our tragic experience with lead, we know a great deal about the likely cumulative effects of such a use upon human exposure. We know that the gradual contamination of the environment by manganese will not be readily reversed. We know that manganese will

Society cannot afford to repeat the public health catastrophe associated with the use of lead in gasoline.

accumulate in many places—particularly in urban dusts and soils—that are subject to intensive human interaction and that will be sources of direct human exposure to manganese.

We rarely have an opportunity to apply the clear lessons of 50 years of very similar experience. To disregard these lessons by approving the widespread and inevitably dispersive use of manganese would be to invite repetition of the public health catastrophe associated with the use of lead as a gasoline additive since 1925. Society cannot afford such a repetition. EDF is urging EPA to reject this new application and immediately suspend all currently permitted use of manganese as a gasoline additive in the United States.

EDF MEMBER ACTION ALERT

Concerned members can help by writing to EPA Administrator William K. Reilly (Washington, DC 20460) urging him to reject Ethyl's application to use MMT.

December 30, 1990

William Reilly
Washington, D.C.

Dear Mr. Reilly:

I am writing to you to urge you not to accept Ethyl's application to use MMT as a gasoline additive. We already know that high doses of manganese are severely toxic to human beings. We do not yet know what the effects of long term low doses are. To approve this additive not knowing this very dangerous, and shortsighted. We only have to look at what happened with lead as a gasoline additive to see the possible consequences and cost. Please don't let yourself be responsible for a repeat catastrophe.

Sincerely,



Rebecca Bradshaw
14 Webber Rd.
Haydenville, MA 01039

January 1, 1991

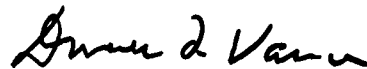
Donald F. and Marilyn M. Vance
8167 Brookside Drive
Olmsted Falls, OH 44138

William K. Reilly
EPA Administrator
Washington, D.C. 20460

Dear Mr. Reilly:

We are writing this to ask you to reject the application of the Ethyl Corporation to use MMT as an additive in gasoline. There are too many unanswered questions involved regarding the impact of manganese on the environment to allow the plan to proceed at this time.

Regards,



Donald F. Vance



Marilyn M. Vance

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Ken Maloney
Julie Ford-Maloney
7051 Ellis, #31
Huntington Beach, CA 92648

January 1, 1991

William K. Reilly, Administrator
Environmental Protection Agency
Washington, D.C. 20460

Re: Ethyl Corporation - MMT gasoline additive

Dear Mr. Reilly:

We must not repeat our costly mistake of 1925 when the above corporation introduced tetraethyl lead into our environment. The terrible consequences are known to all of us.

At that time, it was argued that the amounts of lead added to gasoline were too negligible to be harmful. Of course, we now recognize that tragic mistake.

Unfortunately, however, the same is now being said about MMT, with as little justification. It is our understanding that high levels of manganese are very toxic to humans. It is also our understanding that we do not know what a safe level of manganese is. We do know that it will, if allowed to be added to our fuel, accumulate in our dust and soil over the years.

Surely prudence dictates that an additive with such destructive potential must be rejected, and we urge the Environmental Protection Agency to do so.

Sincerely,

Ken Maloney
Julie Ford-Maloney
Ken Maloney and Julie Ford-Maloney

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24 December 1990

William K. Reilly, Administrator
Environmental Protection Agency
Washington, D.C. 20460

Dear Sir,

Please reject the Ethyl Corporation's application to use MMT (methycyclopentadienyl manganese tricarbonyl) as an additive for gasoline.

I believe that MMT unknown risks are much greater than the purported benefits of reductions in tailpipe emissions (probably a negligible percentage, if any at all).

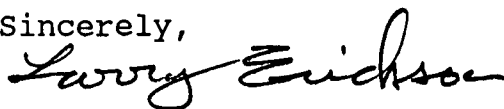
The 1990's MMT is highly reminiscent of the Ethyl Corporation's 1920's tetraethyl lead application. We as a society learned after the fact that tetraethyl lead was a health and environmental mistake.

Please either reject their application outright or require an in-depth review of the cumulative health effects (toxicity) of massive amounts (thousands of tons) of additional manganese in the environment.

Since existing data on manganese is minimal, an extensive research program must be implemented even before an in-depth review can occur.

Please don't allow MMT to be a repeat of the problem we had with tetraethyl lead.

Sincerely,



Larry Erickson
2470 S.W. 173rd Court
Beaverton, OR 97006

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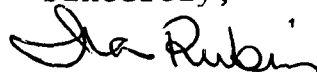
SYOSSET HOMEOWNERS AGAINST POLLUTION OF THE ENVIRONMENT

P.O. Box 234
Syosset, NY 11791-0234
December 26, 1990

Dear Mr. Reilly,

I have recently read articles regarding the possible addition of manganese based compounds as gasoline additives. I would be interested in any information your office has on this item as it relates to the health, safety and welfare of people. We have already received information from the Environmental Defense Fund and wish to hear both sides to better understand the effects of this new idea. I would appreciate a timely response to this request.

Sincerely,


Ira Rubin

Syosset Homeowners' Against
Pollution of the Environment

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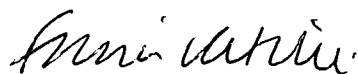
16 Winchester Street, Apt. 2
Brookline, MA 02146
December 25, 1990

Mr. William K. Reilly
Environmental Protection Agency
Washington, D.C. 20460

Dear Sir:

I recently read an article about the Ethyl Corporation's proposal to introduce MMT as a gasoline additive, and I am writing this letter in hopes that you will reject this dangerous idea. Little is known about the effects of MMT on the environment or upon human health. It is known, however, that MMT is a toxic metal. Looking at the United States' past history with regard to lax regulation of toxins and their resulting effects, I must urge you not to consider this proposal until conclusive and independent studies have determined the safety of MMT.

Sincerely,



Fiona Ritchie

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809 N. Brady St.
Ridgecrest, CA 93555
December 22, 1990

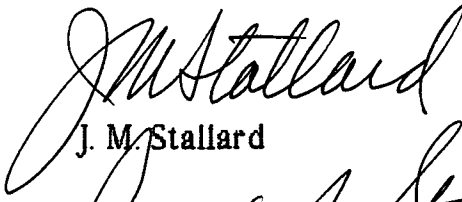
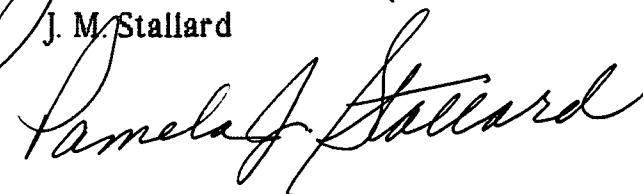
William K. Reilly
Administrator
Environmental Protection Agency
Washington, DC 20460

Dear Mr. Reilly:

I urge you to reject the Ethyl Corporation application for use of methycyclopentadienyl manganese tricarbonyl, MMT, as an octane-enhancing gasoline additive.

Thank you.

Sincerely,


J. M. Stallard


December 21, 1990
PO Box 402
Mission, S.D. 57555

Mr. William K. Reilly
EPA Administrator
Washington, D.C. 20460

Dear Mr. Reilly,

I am concerned about the Ethyl Corporation's plan to use MMT (methylcyclopentadienyl manganese tricarbonyl) as a gasoline additive.

I am urging you to reject that application. There is insufficient data on the potential health effects of this toxic metal on the environment and on humans.

Thank you for your consideration.

Sincerely,
Atha Bedose

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116 SE. 3 AV

Hallandale, FL 33009

Dec. 18, 1990

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Washington, D.C. 20460

My dear Administrator Reilly:

I wish to add my voice to the many concerned citizens who object to Ethyl Corporation's proposed use of MMT, methylcyclopentadienyl manganese tricarbonyl. Manganese at high dose is a demonstrated human neurotoxin with persistent and irreversible pathological effects on brain structure and resulting in severe impairments in movement and mental state. There are indications that manganese may also selectively affect the fetus, the young and the aged.

We do not know what the long term low dose effects of human exposure to manganese are. There is evidence that it can break DNA which may indicate cancer-causing potential.

Kindly heed our pleas and reject Ethyl's application to use M. M. T.

Sincerely,
Sandra Trathen

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6510 Montrose St.
Alexandria, VA
22312

Dec. 18, 1990

Dear Mr. Reilly,

I am writing to you because I'm concerned about the Ethyl Corporation's proposal to use MMT as an octane-enhancing gasoline additive. Use of this additive would bring about results which haven't been determined, but speculations that have been made have projected a public health catastrophe. Please reject Ethyl's application to use MMT. Its ~~supposed~~ claim of reducing tailpipe emissions ~~can~~ ^{can} not compare with the tragic results of exposure to it, if its use is approved.

Thank you very much.

Sincerely,
Sarah J. Hillegass

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DEAR MR. William K. Reilly

I Am A member of the Environmental Defense Fund. Their recent newsletter points out the dangers of using A manganese-based compound AS A gasoline Additive. In view of this light, I urge you to Reject Ethyl's Application to use methycyclopentadienyl manganese tricarbonyl AS A gasoline Additive.

Sincerely
Patrick J. Dwyer

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Marc Vahanian
Susan Vahanian
6609 Lemona Ave.
Van Nuys, CA 91405

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

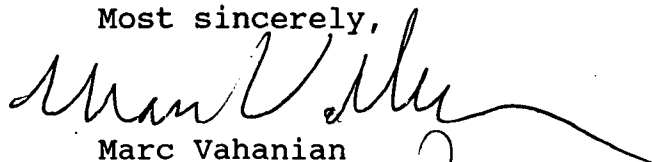
Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! We strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,



Marc Vahanian



Susan Vahanian

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Dear Mr. Reilly,

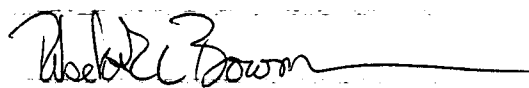
I am unaccustomed to writing letters on environmental matters, but as a practicing forester the environment is a major concern to me.

I recently read the Ethyl Corporation is seeking approval to use methycyclopentadienyl manganese tricarbonyl (MMT) as an octane enhancing gasoline additive. Surely to goodness we don't need to be releasing manganese into the environment. Our air is unhealthy enough as is.

I urge you to reject Ethyl's application to use MMT.

Thank you for your time.

Sincerely



Rebekah L. Bowman

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